



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

MAY 26 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Douglas A. Niedt, President
Steelcote Manufacturing Company
One Steelcote Square
St. Louis, Missouri 63103

Dear Mr. Niedt:

Re: "Addendum #3 to Plan of Study" submitted pursuant to
Administrative Order on Consent, Docket No. VII-91-0025

The Environmental Protection Agency (EPA) has reviewed the "Addendum #3 to Plan of Study" which was submitted to EPA on April 19, 1994. The EPA is approving the Proposal with comments. Generally, the work plan is acceptable and covers those issues discussed with Don McQueen in our April 1994, meeting regarding well placement and construction. However, before approval of the work plan, the enclosed EPA comments must be addressed by Steelcote Manufacturing Company (Steelcote). Steelcote should begin implementation of the Plan of Study upon incorporation of EPA's comments. The implementation of Addendum #3 shall proceed according to the schedule therein. Submittal of the final report shall not exceed fifteen (15) months from this approval.

If you have any questions, you may call me at (913) 551-7478.

Sincerely,

Cynthia L. Hutchison
Cynthia L. Hutchison
Environmental Engineer
RCRA Compliance Section

Enclosure

cc: Alphonse McMahon, Esq. (w/o encl.)



R00353053
RCRA RECORDS CENTER



EPA's Comments of Addendum #3 to
the Plan of Study for
Steelcote Mfg.

Contaminants of Concern as specified in Table 1 include Xylene, Di (2-ethylhexyl) Phthalate, Barium, Chromium, and Lead. Not listed are Toluene and Formaldehyde. Toluene has shown contaminant levels in the original well system that ranged from non-detect to 2000 $\mu\text{g/l}$ and Formaldehyde ranged from non-detect to 380 $\mu\text{g/l}$. These two parameters must be added to the Contaminants of Concern list.